

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,
Plaintiff,

v.

Case No. 23-CR-8

KEVIN McCAA,
Defendant.

J.B.'S POSITION REGARDING MOTION FOR DETERMINATION ON PRIVILEGE

Counsel for Mr. McCaa has moved the court for an order granting access to jail calls between J.B. and his lawyers, which were recorded by the Dodge County jail. McCaa's defense attorneys received these calls pursuant to a defense subpoena. DOC 120 The undersigned was counsel for J.B. in an unrelated matter until a conflict precipitated the need for withdrawal. During the course of representing J.B. counsel had conversations which took place while J.B. was in a county jail. J.B. now invokes attorney client privilege so as to preclude the review, or utilization of any conversations which may have ensued between J.B. and the undersigned.

Dated at Milwaukee, Wisconsin this 26th day of December, 2024.

Respectfully submitted,

/s/ Robert G. LeBell

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